Case 13-11969-amc Doc 64 Filed 08/31/16 Entered 08/31/16 21:55:01 Desc Main Document Page 1 of 1

Thomas G. Egner, Esq.
McDowell Posternock Apell & Detrick, P.C.
46 West Main Street
Maple Shade, NJ 08052
856-482-5544
tegner@MPADLaw.com
Attorneys for Debtors

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA PHILADELPHIA DIVISION

In the Matter of:

Michael S. Mills and Julie L. Mills Debtor Case No.: 13-11969-amc

## PRAECIPE TO CONVERT CHAPTER 13 CASE TO CHAPTER 7 CASE

## TO THE CLERK OF THE BANKRUPTCY COURT:

Pursuant to 11 U.S.C. § 1307(a), the above-named Debtor(s) requests that this court enter an Order converting this case under Chapter 13 to a case under Chapter 7 of the Bankruptcy code (title 11 of the United States Code), on the grounds set forth below:

- 1. The debtors are no longer able to comply with their Chapter 13 plan and do not desire to modify the plan.
- 2. On 8/15/2016 , the above-named Debtor(s) filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code.
  - 3. This case has not been previously converted.

**WHEREFORE**, the debtor, under Bankruptcy Rules 1017(d) and 9013, hereby gives notice of the conversion of this Chapter 13 case to a case under Chapter 7 of Title 11, United States Bankruptcy Code.

APPROVED: <u>/s/ Michael S. Mills /s/ Julie L. Mills</u> Michael S. Mills Julie L. Mills

McDOWELL, POSTERNOCK, APELL & DETRICK, P.C.

/s/ Thomas G. Egner Thomas G. Egner ESQ. Dated: August 15, 2016